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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 HANFORD PROJECT OFFICE

712 Swift Boulevard, Suite 5 Richland, Washington 99352

May 13, 2002

Arlene Tortoso U.S. Department of Energy Richland Operations Office P.O. Box 550, A6-38 Richland, WA 99352

RECEIVED MAY 1 7 2002

EDMC

Dear Ms. Tortoso:

Enclosed please find comments from the U.S. Environmental Protection Agency on the Sampling and Analysis Plan for the 200-ZP-1 Groundwater Monitoring Well Network, Draft A. If you have any questions, please contact me at 376-8631.

Sincerely,

Dennis Faulk

Remedial Project Manager

cc:

John Price, Ecology

Administrative Record: 200-ZP-1

EPA Comments on Sampling and Analysis Plan for the 200-ZP-1 Groundwater Monitoring Well Network

1. Page 1-1, section 1.0, 1st paragraph

This paragraph states that this monitoring network does not cover assessment of the remediation system yet many of the proposed wells are for that purpose. Suggest dropping the 2nd sentence of this paragraph. In addition please add a paragraph that indicates that although this SAP only monitors the upper 50 feet of the aquifer follow on work as part of the RI/FS process will look at contaminants at depth.

2. Page 1-1, section 1.1 Background

This section should be expanded to give a brief description of each of the major program elements that are contributing to the ZP-1 groundwater problem. In addition a map should be added to this section identifying the facilities in the ZP-1 OU.

3. Page 1-3 through 1-6 COC's

The list of COC's presented in table 1-1 and table 1-3 does not match with the COC's listed in decision statement 2 on page 1-6. Suggest changing the tables to match the decision rule.

4. Page 1-10, table 1-6

Rational should be provided for the need and priority for each new well.

5. Page 2-1, table 2-1

The action level and CRDL for arsenic is confusing. Please provide explanation why the action level is 50 and the CRDL is 100 micrograms/liter.

6. Page 2-6, data management

EPA expects this data will also be reported in the annual groundwater management report. Please add that to the text.

7. Page 3-1, section 3.2, 2nd paragraph.

Changes will also need to be documented by periodic revisions to this SAP. Please indicate this fact.

8. Appendix B

EPA would like to further discuss this concept with DOE and Ecology.